



("TLG's") operating accounts at Wells Fargo Bank, in an attempt to force the defendants to surrender in this litigation. To defend against these garnishments, the defendants have today filed a motion to approve a supersedeas bond in accordance with Texas law. This motion raises the same issue as *Umbrella Bank*, in which the Court interpreted Rules 62(d) and (f) to protect the interests of a judgment debtor facing similar circumstances.

3. In an earlier effort to obtain protection from the Court, on August 1, 2006, the defendants filed a motion seeking a temporary stay under Rule 62(b). In connection with that motion, they filed a request for an oral hearing at the Court's earliest convenience. The plaintiffs have filed a response. They do not oppose an oral hearing on that motion, but while it has been pending, they have continued to attack TLG by filing new garnishment actions.


4. So that these issues do not become moot before this Court rules on the defendants' motions for stay and for determination of supersedeas bond, the defendants request a temporary stay of the judgment and collection efforts. The defendants respectfully request an oral hearing at the Court's earliest convenience.

#### **PRAYER**

The defendants request a temporary stay of the judgment, pending this Court's resolution of the post-judgment motions, their motions for stay, and for determination of a supersedeas bond. The stay requested includes post-judgment discovery issued by the plaintiffs. The defendants request such other and further relief to which they may be entitled. A proposed form of order is attached.

Respectfully Submitted,

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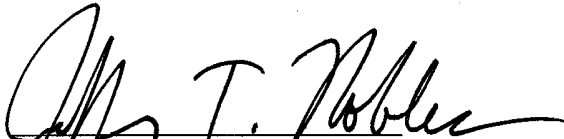
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#### CERTIFICATE OF CONFERENCE

I have conferred with counsel for Plaintiffs regarding this motion. This motion is opposed.



Jeffery T. Nobles

#### CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing instrument was sent to the following attorneys-of-record pursuant to the Federal Rules of Civil Procedure on this 17<sup>th</sup> day of August 2006 via hand delivery.

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